



POLICY ON FAIR DISCLOSURE TO INVESTORS

Policy Statement

Atlas Corp. (the "Corporation") is committed to fair disclosure of information about the Corporation without advantage to any particular analyst or investor, consistent with the Securities and Exchange Commission's ("SEC") Fair Disclosure Regulation ("Regulation FD"). Although as a foreign private issuer the Corporation is not subject to Regulation FD, the Corporation has adopted this policy. The Corporation will continue to provide current and potential investors access to key information reasonably required to make an informed decision on whether to invest in the Corporation's securities.

This policy is designed to comply with Regulation FD and (i) prohibits the selective disclosure of material, nonpublic information about the Corporation, (ii) sets forth procedures that will prevent such disclosure, and (iii) when determined appropriate by management or required by applicable law, provides for the broad, public distribution of material information regarding the Corporation.

Philosophy

The Corporation and its management believe it is in the Corporation's best interest to maintain an active and open dialogue with current and potential investors regarding the Corporation's historical performance and future prospects. The Corporation supports communication with its investors through public articulation of its strategies, business strengths, and growth opportunities through an active dialogue.

Compliance

The Corporation complies with all applicable periodic reporting and disclosure requirements outlined by the SEC. It has been, and will continue to be, the Corporation's practice to disclose material information about the Corporation publicly, not selectively.

Compliance Guidelines

The Corporation has established the following guidelines based on Regulation FD and to avoid selective disclosure of material, nonpublic information.

- I. Disclosure Policy. The Corporation will communicate its anticipated approach to Regulation FD by posting this policy on its website, www.atlascorporation.com. Any changes will be posted promptly.
- II. Authorized Representatives of the Corporation
 - a. The Corporation's CEO and CFO are the Corporation's designated spokespersons and may communicate on behalf of the Corporation to analysts, securities market professionals, investors and shareholders of the Corporation ("Regulation FD Persons").
 - b. Directors, officers or other employees of the Corporation and its wholly owned subsidiaries, including but not limited to members of the Corporation's Investor Relations Department ("Investor Relations Representatives"), may communicate with Regulation FD Persons only if and to the extent (i) authorized by the Corporation's CEO or CFO or (ii) contemplated in this policy, and provided always that any such communication is permitted under Regulation FD.
 - c. Employees should refer all questions about the Corporation's financial results or future financial performance to the CEO, the CFO or an Investor Relations Representative.
 - d. Senior managers may make announcements and conduct interviews about their business, technology and significant developments with the media; however, these



announcements or interviews may not contain financial projections or other material, nonpublic information.

III. Quarterly Earnings Release Conference Calls and Updates

- a. The Corporation will hold quarterly investor conference calls and webcasts open to the public and media (in listen-only mode) and provide public notice about the call through a media release by electronic distribution through Marketwired (or another appropriate newswire service) and posting on the Corporation's website. For quarterly conference calls, notice will be posted on the Corporation's website approximately one week before the conference call.
- b. A playback of the conference call will be provided for approximately two weeks after the conference call. In addition, a playback of the webcast will be available for approximately 12 months at the Corporation's website www.atlascorporation.com.
- c. Any guidance to Regulation FD Persons about the Corporation's financial goals will be provided through public disclosure, such as annual reports, media releases or conference calls open to the public.

IV. Questions to Investor Relations

Investor Relations Representatives will take phone calls from Regulation FD persons with questions. In accordance with Regulation FD, however, the Corporation has adopted rules about when questions will be answered.

- a. Investor Relations Representatives may immediately respond to questions that relate to information which is solely historical and already public.
- b. The Investor Relations Representatives generally may also answer questions that relate to forward-looking information contained in the Corporation's quarterly earnings release, in the quarterly earnings release presentation, or disclosed by the Corporation during the earnings conference call.
- c. All other questions from Regulation FD Persons must be submitted in writing to Atlas Investor Relations via e-mail (ir@atlascorporation.com) or by letter. The Corporation will then determine whether to respond (i) directly to the person making the inquiry, (ii) through a public disclosure, or (iii) not at all.

V. Analyst Models and Reports

- a. The Corporation may provide public earnings guidance, as it recognizes that such information may assist investors in making an informed decision on whether to invest in the Corporation's securities. The SEC, however, has prohibited giving nonpublic earnings guidance to Regulation FD Persons. The Corporation will not, therefore, provide Regulation FD Persons with nonpublic earnings guidance unless permitted by Regulation FD.
- b. While the Corporation may elect to review materials prepared by Regulation FD Persons, it will not comment (orally or in writing) upon any such material, except that it may correct inaccuracies relating to:
 1. Public, historical information, and
 2. In limited circumstances, forward-looking information relating to statements made by the Corporation in its quarterly earnings release, in the quarterly earnings release presentation, or publicly disclosed by the Corporation during the quarterly earnings conference call.



V. Quiet Period

The Corporation will observe a "quiet period," during which the Corporation will not comment on the Corporation's financial outlook or projections. These periods will normally be from the last day of each fiscal quarter and continue until after earnings results are publicly released for that quarter.

VI. Presentations

- a. The Corporation will use the safe harbor guidelines for forward-looking information as part of individual, group, and conference investor communications formats.
- b. Items of interest to investors will be posted in the Investor Relations section of the Corporation's website, including information on conference call dates and times, as well as instructions on how to access conference calls. All interested persons may access conference calls via telephone or webcast. Analysts providing research coverage of the Corporation may be permitted to participate in conference calls.
- c. The Corporation will participate in investor conferences. If any inadvertent disclosure of material, nonpublic information occurs at a conference, appropriate public disclosure will be made promptly.
- d. The CEO, CFO or Investor Relations Representatives will meet with individual investors, and groups of investors. Similarly, the Corporation will participate in other public forums at which analysts or investors could be present, including industry seminars and trade shows, employee, retiree and annual shareholder meetings, and meetings with commercial partners that are also shareholders. The Corporation does not intend to disclose any material, non-public information during these meetings. If any material, non-public information is disclosed, appropriate public disclosure will be made promptly.

VII. Definitions of "Material" and "Nonpublic" Information

Material Information. Information is deemed material if there is a substantial likelihood that a reasonable investor would consider it important in deciding whether to buy, hold or sell a security. In simple terms, material information is any type of information that could reasonably be expected to affect the price of the Corporation's securities. While it is not possible to identify all information that may be deemed "material," the following types of information relating to the Corporation typically would be considered "material":

- Financial performance, especially quarterly and year-end earnings, and significant changes in revenue trends, financial condition or performance, or liquidity;
- Projections of earnings or losses, including expressions of comfort or discomfort with any guidance provided by the Corporation regarding an uncompleted or unreported period;
- Expressions of comfort or discomfort with the "range" or with a particular analyst's projections about future operating results;
- The Corporation's strategic plans;
- Defaults on outstanding debt or preferred stock;
- Bankruptcy or receivership;
- Potential mergers, dispositions and acquisitions or significant sales of assets;
- Changes or disputes with the Corporation's independent auditor;
- New major contracts or customers, or the loss thereof;



- Significant events regarding the Corporation's securities, such as splits, public or private securities offerings or establishment of or changes in securities repurchase programs or dividend policies or amounts;
- Significant changes in senior management;
- Actual or threatened major litigation or other legal or regulatory action, significant developments relating to or the resolution of such litigation or other legal or regulatory action; and
- Updates regarding any prior significant disclosure that has materially changed.

Nonpublic Information. "Nonpublic" information is information that has not been previously disclosed to the general public by means of a press release, SEC filing or other media for broad public access. Disclosure to even a large group of analysts or shareholders does not constitute disclosure to the public.

Further Information about Regulation FD

All inquiries regarding the provisions or procedures of this policy should be addressed to Atlas Investor Relations via e-mail (ir@atlascorporation.com) or by letter.

Adopted March 10, 2020